

**DOCKET SECTION**

BEFORE THE  
POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997


DOCKET NO. R97-1

**ANSWER OF UNITED PARCEL SERVICE  
TO INTERROGATORIES OF  
UNITED STATES POSTAL SERVICE  
(USPS/UPS-1)**

(February 6, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service ("UPS") hereby serves and files the response of UPS to interrogatory USPS/UPS-1 of the United States Postal Service.

Respectfully submitted,



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Attorneys for United Parcel Service

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Of Counsel.

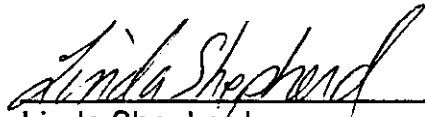
**ANSWER OF UNITED PARCEL SERVICE  
TO INTERROGATORY OF  
THE UNITED STATES POSTAL SERVICE**

**USPS/UPS-1.** Please provide a description of and documentation of all alternative mail processing variability analyses considered by any outside consultants contacted by UPS other than witness Neels, but not used in UPS testimony. For any analyses conducted by someone other than witness Neels, please identify the individual(s) involved.

**Response to USPS/UPS-1.** Although UPS believes this interrogatory is not proper discovery under the work product doctrine, UPS provides the following answer without waiving its right to object to other discovery requests on the basis of the work product doctrine: NONE.

**DECLARATION**

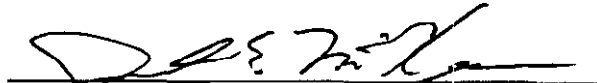
I, Linda Shepherd, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

  
Linda Shepherd

Dated: February 5, 1998

**CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in  
accordance with section 12 of the Commission's Rules of Practice.

  
\_\_\_\_\_  
John E. McKeever

Dated: February 6, 1998  
Philadelphia, PA